

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATION AND [PROPOSED]
ORDER REQUESTING ADDITIONAL
TIME FOR DISCUSSION AND
BRIEFING OF PARTIES' SEARCH
TERMS FOR PLAINTIFFS' DATA**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline for Personal Injury Plaintiffs and Defendants to finalize negotiations over search terms to be run across the bellwether personal injury plaintiffs' data sources from August 16, 2024, to August 23, 2024, with any necessary letter briefing to be submitted by August 30, 2024.

The parties declare in support of this request:

1. Plaintiffs and Defendants are engaged in ongoing search term negotiations relating to Defendants' previously served Requests for Production.

2. Plaintiffs and Defendants mutually agree that they have made good progress on negotiating agreement to most of Plaintiffs' and Defendants' proposed terms and that they would benefit from more time to continue their conferrals and attempt to narrow disputes regarding a small number of remaining search terms.

3. Plaintiffs and Defendants believe that an extension until August 23, 2024, to finalize negotiations will afford adequate time for such negotiations.

4. Plaintiffs agree to start running agreed-upon terms and continue making rolling productions of documents while the parties continue negotiations on the other terms.

5. Extending this deadline will not affect any other deadline affixed by the Court.

6. This is the first request to extend this deadline.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Defendants to finalize search term negotiations to August 23 with any necessary letter briefing to be submitted by August 30.

Respectfully submitted,

Dated: August 16, 2024

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IT IS SO ORDERED that the foregoing Stipulation is approved.

DATED: _____

HONORABLE PETER H. KANG
United States District Court Magistrate Judge

ATTESTATION

I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 16, 2024

By: /s/ Gregory L. Halperin

